

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

KEITH COLE, JACKIE BRANNUM, RICHARD KING,
MICHAEL DENTON, FRED WALLACE, and MARVIN RAY
YATES, individually and on behalf of those similarly situated,
Plaintiffs,

CIVIL ACTION NO.
4:14-cv-1698

v.

**BRYAN COLLIER, in his official capacity, ROBERT HERRERA,
in his official capacity, and TEXAS DEPARTMENT OF
CRIMINAL JUSTICE,**
Defendants.

DECLARATION OF SCOTT MEDLOCK

1. My name is Scott Medlock. I am over the age of 18. This declaration is true and correct, and based on my personal knowledge.
2. I am licensed to practice law in the State of Texas, as well as the four Texas United States District Courts and the Fifth Circuit Court of Appeals. I work for Edwards Law, class counsel for the Plaintiffs in this action. I submit this declaration in support of the Motion to Approve Class Action Settlement and Amend Class Certification Order.

I. Notice to Class Members

3. The following steps were taken by Class Counsel to deliver the notice form to class members.
 4. After the Court approved the notice (Doc. 1065, pp. 37-40), the notice was translated into Spanish.
 5. A confidential letter written in plain language by class counsel (and translated into Spanish) was placed in a sealed envelope with copies of the notice (in English and Spanish) and addressed to each class member. (The letter has since been filed with the Court by an objector, at

Doc. 1089, pp. 4-5). 1,329 sealed envelopes were delivered to the Office of the Attorney General for distribution to class members.

6. Defense Counsel and TDCJ have represented to me that the notices described above were delivered to all class members who remained in TDCJ custody.

7. I met with many class members after the envelopes were purportedly distributed, and did not speak with a single inmate who claimed he did not receive his envelope.

8. Between March 6, 2018 (when the class composition was set with the execution of the agreement) and when the notices were distributed (beginning March 29), TDCJ reports that 41 inmates were released from custody (either due to completion of their sentence, or on parole). These are the only class members who did not receive notice. However, upon release from custody, inmates cease to be class members. *See* Doc. 989-4, p. 8. Even without this feature of the class definition, however, well over 96% of class members received the individualized notice.

9. On April 24, 2018, Class Counsel conducted large group presentations at the Pack Unit to explain the settlement agreement and answer questions. A PowerPoint Presentation (attached as Exhibit A) was used to explain the lawsuit, and the inmates' rights under the settlement. TDCJ officials informed us that over 1,000 class members attended the presentations. TDCJ officials represented that all inmates present at the prison were offered the opportunity to attend. Very small presentations were made for inmates whose security classifications prevented them from attending with other inmates.

10. During the April 24, 2018 presentations, inmates were allowed to ask questions to Class Counsel.

II. Opt Out Report

11. I have spoken, either in person or over the telephone, with almost all the inmates who have requested to opt out of the class thus far. Only three inmates who have requested to opt out have yet to speak with an attorney.

12. Sixteen inmates, after consultation with Class Counsel, still want to opt out of the class. The names of these inmates have been provided to Defense Counsel for removal from the class member list.

13. Class Counsel is satisfied these inmates made an informed decision that was not the product of coercion. These inmates were informed they were irrevocably waiving their rights under the settlement, including their right to air-conditioned housing.

14. Class Counsel has also received a number of opt-out forms completed by inmates who are not class members (principally inmates who are incarcerated at the LeBlanc Unit). Because these inmates are not class members, Class Counsel has taken no action on their requests to opt out.

II. Attorneys' Fees and Expenses

15. Attached as Exhibit B to this declaration are additional attorneys' fees incurred by Class Counsel since the filing of the motion to approve the settlement.

16. Attorneys and legal assistants for Edwards Law have performed the additional labor indicated in Exhibit C to this declaration.

17. The additional hours performed by attorneys and legal assistants for Edwards Law are summarized as follows:

- a. Jeffrey Edwards – 50.2 hours x \$650/hour = \$32,630.00

- b. Scott Medlock – 102.6 hours x \$525/hour = \$53,865.00
- c. Michael Singley – 81.8 hours x \$550/hour = \$44,990.00
- d. David James – 52.8 hours x \$400/hour = \$21,120.00
- e. Wallis Nader – 71.7 hours x \$300/hour = \$21,510.00
- f. Shannon Rovzar – 11 hours x \$150/hour = \$1,650.00
- g. Justin Atkinson – 19 hours x \$150/hour = \$2,850.00

18. Class Counsel has performed an additional 389.1 hours of labor since March 6, 2018, for a total of 10,298.6 hours during the course of this litigation. The additional labor since March 6, 2018 justifies a reasonable an additional fee of \$18,615.00. The total reasonable attorney fee is thus \$4,607,081.25.

19. I declare under penalty of perjury under the laws of the United States that the above is true and correct.

Executed on May 7, 2018 in Austin, Texas.



Scott Medlock

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Exhibit A

Pack Unit Class Action Settlement

Summer Heat is Dangerous

- **23 known Heatstroke Deaths in TDCJ Prisons**
- Heat exhaustion injuries happen **every summer** at the Pack Unit
- Heat index over 88 degrees is dangerous
- Heat is more dangerous for elderly, and people with certain medical conditions.

Preliminary Injunction (2017)

- 9 day hearing with Judge Keith Ellison
- Found “**conditions of confinement at the Pack Unit create a substantial risk of serious injury or death.**”
- Ordered “heat sensitive” inmates transferred to safe temperatures, and improved respite for “healthy” inmates.



Key Settlement Terms

- ALL Class Members
 - **Pack Unit will be air-conditioned**
 - Guaranteed housing in air conditioning
 - All parole-required programming in air conditioning
- “Heat Sensitive” Class Members
 - All of the above PLUS
 - Transport in air-conditioned vehicles

Who is in the Class?

- Prisoners at the Pack Unit between July 19, 2017 to August 8, 2017
- Prisoners at the Pack Unit on March 6, 2018
- List of all class members is with the settlement agreement in the Law Library

Everyone at the Pack Unit will benefit

Who is “Heat Sensitive”?

- Prisoners with certain medical problems
- Common conditions are:
 - Over age 65
 - Heart problems
 - Obesity
 - Certain medicines
- List is available in the notice letter you received, and in the Law Library

Guaranteed Air Conditioning

- **All parole required programs** will be provided in air conditioning
- **All required medical treatment** will be provided in air conditioning

Why is the air conditioning “temporary”?

- Texas Legislature needs to approve TDCJ Budget
- Legislature does not meet again until January 2019
- If Legislature approves the money, permanent AC will go in before summer 2020.



Should I “Opt Out”?

- **NO**
- **“Opting out” gives up your right to air conditioning**
- **You DO NOT need to opt out for medical care or programs required for parole**
 - Participation in the lawsuit **DOES NOT** change parole odds
 - six named plaintiffs have been paroled
- You DO NOT need to opt out now if you want to participate in a program later
- If you do want to opt out, complete form, mail it to Class Counsel, 1101 E. 11th Street, Austin, TX

Questions

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Exhibit B

Pack Unit Class Action**Jeff Edwards Attorney's Fees (\$650/hour)****(March 7 to May 8, 2018)**

Date	Hours	Description
3/7/18	7.5	prepare for and attend hearing to approve settlement agreement
3/8/18	1	Review and revise response to Stringfellow motion for emergency stay (Doc 990)
3/10/18	0.7	Review and revise response to Stringfellow motion for emergency stay (Doc 990)
3/11/18	1.3	Review and revise response to Stringfellow motion for emergency stay (Doc 990)
3/13/18	0.9	Confer with opposing counsel concerning motion for emergency stay; prepare for hearing regarding same
3/14/18	1.5	Prepare for and attend (via phone) hearing on motion to stay
3/23/18	0.2	review order re: preliminary approving settlement
4/16/18	1.7	Review and revise response to Amir Sharif motion for sanctions
4/18/18	0.5	review and confer regarding power powerpoint presentation for inmate class notice
4/19/18	0.3	review and confer regarding power powerpoint presentation for inmate class notice
4/23/18	4.5	Prepare for notice presentations to Pack Unit inmates
4/24/18	10.4	Prepare for and conduct Pack Unit presentations concerning notice and settlement terms, and opt out procedures, meet with R. Yates and K. Cole, travel to and from Pack Unit
4/25/18	0.3	Review and revise correspondence to D. McCarty concerning settlement compliance.
4/30/18	2.4	review and revise response to objections to settlement
5/4/18	0.3	Prepare for and confer with opposing counsel about approval issues and need for status conference
5/6/18	2.3	Review and revise letter to K. Cole; review and revise motion to withdraw as individual counsel for K. Cole; review and revise response to inmate objections to class settlement.
5/7/18	0.4	Update attorney's fees hours
5/7/18	0.5	Prepare for and participate in status conference with the Court
5/7/18	4.5	Prepare for approval hearing
5/8/18	9	Prepare for and participate in final approval hearing; travel to and from Houston
Total Hours	50.2	
Total Fee	\$32,630.00	

Pack Unit Class Action Mike Singley Attorneys' Fees (\$550 per hour)
(Jan. 30, 2018 to May 3, 2018)

Date	Hours	Description
1/29/18	13	Prepare for and attend mediation
1/30/18	15	Prepare for and attend mediation
1/31/18	4.2	Conclusion of mediation from midnight to 2 am; Review Ball II opinion from 5th Circuit; conference with team re: same and impact of same; review draft Rule 28j letter to 5th Circuit and discuss with team.
2/2/18	0.8	Status conference with Court; preparation for same.
2/6/18	0.5	Review Draft Motions to abate appeals.
2/14/18	0.6	Team call with D. McCarty re: motion to approve settlement agreement and status of Pack inmates and class/subclass member lists.
2/15/18	2	Review and revise drafts from S. Medlock for Motion for Preliminary Approval of Settlement, Final Judgment, Opt Out form, and Client Declarations.
2/23/18	1.9	Review and revise draft from TDCJ of proposed settlement agreement; conferences with S. Medlock re: same.
2/26/18	1.5	Review and revise latest draft proposed settlement agreement from TDCJ; legal research re: same; conferences with S. Medlock re: same.
2/27/18	1.3	Review legal research and caselaw from D. James re: arguments on <u>preclusion of individual damage claims</u> .
2/28/18	0.8	Review TDCJ's edits to proposed settlement agreement.
3/1/18	3.9	Meeting with Mr. McCarty and Mr. Warner to finalize settlement agreement language; preparation and conferences with team re: same; review revised draft of agreement prepared after the meeting.
3/2/18	0.8	Review revisions to opt-out forms and discussions with team re: same and opt-out procedures.
3/5/18	1.7	Review and revise motion for preliminary approval of settlement and TDCJ's revisions to proposed order; discussions with team re: same.
3/6/18	10.5	Visit to Pack Unit with Mr. Medlock to see clients and other inmates re: settlement, approval process, objections, and opt-out procedures; travel to Pack and then to Houston for hearing the next day; review legal research effect and ramifications of objections to <u>settlement and potential responses to same</u>
3/7/18	3	Hearing on Motion for Preliminary Approval of Settlement; return travel from Houston to Austin.

Pack Unit Class Action Mike Singley Attorneys' Fees (\$550 per hour)
(Jan. 30, 2018 to May 3, 2018)

3/9/18	3.2	Review emergency motion to stay settlement and for appointment of independent counsel by non-class member Sharif; review and revise draft response to same by Mr. Medlock; discussions with team re: same.
3/12/18	1.3	Review and revise drafts of advisory to the Court re: subclass composition; review class and non-class notices proposed by the Court; conferences with team re: same.
3/13/18	1.1	Review and revise latest draft response to emergency motion of non-class member Sharif; conference with Mr. McCarty re: same and review TDCJ's draft filing re: same; review final revisions to proposed class notice form.
3/15/18	0.9	Call with Mr. McCarty re: subclass member list; preparation for same and discussion with Mr. James.
3/16/18	1.2	Review and revise draft motion to extend preliminary injunction; review letter from Mr. Cole re: proposed settlement and discussion with team re: same.
3/22/18	11	Visit to Pack Unit with Mr. Medlock to see clients and other inmates re: proposed settlement, objections, and opt-put procedures (including round trip travel time).
3/29/18	3	Assist in preparation of class notices, supervise creation of class notice materials
4/16/18	0.6	Review letter from Mr. Cole re: proposed settlement and discussion with Mr. Medlock re: same.
4/19/18	0.5	Discussion with Mr. Medlock and Mr. Edwards re: SM meetings with Mr. Cole and Mr. Yates and issues to be discussed.
4/24/18	0.5	Review email from Mr. Medlock re: Pack inmate meetings, and conference with Mr. Medlock re: same.
5/8/18	9	prepare for and attend final fairness hearing

Total Hours	93.8
Total Fee	\$51,590.00

Pack Unit Class Action**Scott Medlock Attorney's Fees (\$525/hour)****(March 7 to May 4, 2018)**

Date	Hours	Description
3/7/18	8	prepare for and attend hearing to approve settlement agreement
3/8/18	4.1	draft response to Stringfellow motion for emergency stay (Doc 990)
3/8/18	0.1	call w C Warner re subclass membership
3/8/18	1	meeting w JE, MS, DJ, WN re pro se motion to stay (Doc. 990) and response thereto
3/8/18	0.5	review pro se emergency motion to stay; correspondence w team re same
3/8/18	1.6	draft confidential letter to class members for inclusion with court approved notice
3/8/18	0.5	revised omnibus response to pending pro se motions
3/10/18	4	draft response to Stringfellow emergency motion to stay (Doc. 990), opt out
3/11/18	4.3	draft notice to Court re proposed notice changes
3/11/18	0.3	revise Court's proposed notice to class members
3/11/18	0.9	revise Court's proposed notice to class members
3/11/18	1	draft advisory to court re subclass size and membership
3/11/18	0.4	reviewed Court's proposed notices to class members, other inmates
3/11/18	2.4	draft/review response to Stringfellow emergency motion to stay, opt out (Doc. 990)
3/14/18	0.5	attend hearing on class cert questions
3/14/18	0.4	prepare for hearing on class cert
3/19/18	1.9	prepare for and attend phone hearing on Stringfellow/Sharif objections (Doc. 990), argued Plaintiffs' position at hearing
3/19/18	0.4	call w A Jameson re class member V Salinas
3/22/18	11	SM and MS travel to Pack Unit, meet w class reps + 4 other inmates re settlement terms, objections and opt outs
3/23/18	0.2	review order preliminary approving settlement
3/28/18	1	supervise preparation and distribution of class notices
3/29/18	5	supervise preparation and distribution of class notices
4/2/18	0.1	reviewed opt out request (A Gonzalez)
4/2/18	0.6	reviewed pro se filings from 4/2/18
4/9/18	0.2	review opt out forms, email to team re thoughts on 6 opt outs, meet with JA re system for organizing and responding to opt outs
4/9/18	0.3	call w N Smith, DJ re notice to class members released from custody, pro se appeal
4/16/18	0.1	revise withdrawal of opt out request form
4/16/18	0.4	prepare for meetings at Pack Unit with opt out class members
4/16/18	1.4	revise response to Amir-Sharif motion for sanctions, declaration in support

Pack Unit Class Action**Scott Medlock Attorney's Fees (\$525/hour)****(March 7 to May 4, 2018)**

4/16/18	3.9	revise draft response to Amir-Sharif motion for sanctions
4/16/18	1.3	review objections to settlement - Franklin, Baity; draft response to same; draft running list of objections, substance thereof
4/18/18	0.3	prepare powerpoint presentation for inmate class notice presentations
4/18/18	0.3	review opt outs received, cross check against class membership list, meet with JA re same
4/19/18	1.4	prepare for meetings with opt out individuals at Pack Unit
4/19/18	0.8	prepare powerpoint presentation for inmate settlement presentations
4/20/18	0.7	draft response to objections to settlement
4/20/18	0.6	reviewed transcript on emergency motion hearing, draft supplement to response to motion for sanctions
4/20/18	1.3	reviewed pro se filings and objections, cataloged same in draft response to objections
4/24/18	8	prepare for and conduct class action settlement presentations at Pack Unit
4/23/18	7	prepare for and meet with opt out inmates at Pack Unit
4/25/18	2.4	draft plaintiffs response to objections to settlement
4/25/18	3.5	draft correspondence to D McCarty re implementation of settlement
4/26/18	5	draft plaintiffs response to objections to settlement
4/26/18	5.8	draft plaintiffs response to objections to settlement
4/30/18	1.6	revised response to objections to settlement
4/30/18	1.6	draft declaration re class notice for filing with court
5/1/18	9	prepare for and meet with clients, opt outs at Pack Unit to track settlement compliance, draft memo to file re same
5/2/18	0.5	revise omnibus response to pro se filings
5/3/18	0.5	prepared report on attorneys fees/hours since March 6, 2018
5/3/18	0.5	review correspondence from D McCarty re various settlement issues; email to team re same
5/4/18	6.6	revise response to objections to settlement, draft supplement to motion to approve settlement, revise declaration in support of settlement agreement
5/7/18	6.5	revise response to objections to settlement and other pro se filings, prepare for final fairness hearing
5/8/18	9	prepare for and attend hearing to approve settlement agreement
Total Hours	130.7	

Total Fee	\$68,617.50
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Pack Unit Class Action**David James Attorneys' Fees (\$400/hour)****(March 5 to May 3, 2018)**

Date	Hours	Description
3/6/18	1.0	Revising motion to approve class action settlement and finalizing exhibits thereto.
3/6/18	1.5	Researching caselaw in preparation for motion to approve class action settlement.
3/6/18	2.2	Prepare for preliminary class approval hearing; review of relevant documents and conference with co-counsel regarding same.
3/7/18	0.1	Prepare for preliminary class approval hearing.
3/7/18	6.5	Prepare for, travel to, and attend preliminary class approval hearing.
3/7/18	0.7	Revising motion to approve class action settlement and finalizing exhibits thereto.
3/8/18	1.6	Review of Sharif motion and exhibits to same (Doc. 990); conference with legal team regarding plan to respond to same.
3/9/18	0.4	Revising supplement to motion for class settlement approval.
3/9/18	0.3	Revising supplement regarding class settlement motion; review of relevant documents.
3/9/18	0.4	Review of class list issue in comparison to Sharif filing petition.
3/12/18	1.7	Review of relevant documents pertaining to Sharif motion response drafting.
3/12/18	0.6	Review of relevant documents relating to inmate class list and Sharif motion response drafting.
3/12/18	0.3	Revising response to Sharif motion (Doc. 990).
3/12/18	6.1	Review of relevant documents relating to subclass inmate list relating to settlement proposal.
3/13/18	0.6	Revising response to Sharif (Doc. 990)
3/13/18	0.3	Revising response to Sharif (Doc. 990); review of documents relating to subclass inmate list relating to settlement proposal; conference with M. Singley and S. Medlock regarding same.
3/13/18	0.1	Review of inmate letters to the court.
3/13/18	0.9	Review of subclass list and revising correspondence to opposing counsel regarding same.
3/14/18	1.3	Review of subclass list and revising correspondence to opposing counsel regarding same.
3/14/18	0.1	Review of proposed notice.
3/15/18	0.1	Review of inmate filing.
3/16/18	0.4	Conference with D. McCarty, M. Singley, S. Medlock regarding proposed settlement subclass and logistical issues. Conference with M. Singley and S. Medlock regarding same and PI extension motion.
3/16/18	1.9	Drafting and revising PI extension motion.
3/16/18	0.6	Review of client letter; review of and revising correspondence with co-counsel regarding same.
3/19/18	0.1	Review of client letter; review of and revising correspondence with co-counsel regarding same.
3/20/18	0.3	Review of inmate letters and motions with the Court.

Pack Unit Class Action**David James Attorneys' Fees (\$400/hour)****(March 5 to May 3, 2018)**

Date	Hours	Description
3/23/18	0.5	Review of subclass list and revising correspondence to opposing counsel regarding same.
3/26/18	0.7	Review of inmate issues and preparing letter to inmate regarding same.
3/26/18	0.1	Review of preliminary injunction deadlines.
3/26/18	0.2	Review of subclass list and revising correspondence to opposing counsel regarding same.
3/27/18	1.2	Review of subclass list and revising correspondence to opposing counsel regarding same.
3/28/18	5.8	Preparing class notice materials.
3/29/18	1.6	Preparing class notice materials.
3/30/18	1.8	Research regarding objectors/opt outs
4/3/18	0.4	Review of opt out issue.
4/3/18	0.4	Conference with S. Medlock and W. Nader regarding opt outs; protocol for addressing.
4/3/18	0.5	Review of opt out requests, review of related records, and correspondence to co-counsel regarding same.
4/4/18	0.6	Review of inmate issues and relevant documents; conference with co-counsel regarding same.
4/5/18	0.1	review of opt out issue and correspondence to co-counsel regaarding same.
4/6/18	1.0	Review of inmate family issue, conference with co-counsel regarding response to same.
4/10/18	1.1	Review of notice of appeal and research regarding related issues.
4/10/18	2.1	Review of notice of appeal and research regarding related issues; conference with co-counsel regarding same.
4/11/18	1.2	Review of opt out requests, review of related records, and conference with legal team regarding same.
4/18/18	0.4	Review of relevant documents regarding opt out letters and other inmate issues.
4/19/18	0.1	Review of relevant documents regarding opt out letters and other inmate issues.
4/20/18	0.9	Review of relevant documents and annotation of time spent regarding same relating to objections and opt outs
4/25/18	0.2	Review of S. Perez filing.
4/25/18	0.1	Review of objections.
4/26/18	0.2	Review of Amir-Sharif filing
4/26/18	0.3	Call with family member regarding Pack Unit inmate.
4/30/18	0.1	Review of PLRA issue with temp. injunction.
5/2/18	0.1	Review of relevant documents related to objections.
5/2/18	0.3	Conference with co-counsel regarding objections.
5/3/18	0.7	Review and revising annotations of time spent.
Total:	52.8	
Total Fee:		\$21,120.00

Pack Unit Class Action Wallis Nader Attorneys' Fees (\$300 per hour)
(February 19 to May 3, 2018)

Date	Hours	Description
2/19/18	0.2	draft spreadsheet to track and assess pro se filings
2/19/18	2.3	draft plaintiff settlement declarations
2/20/18	0.4	draft plaintiff settlement declarations
2/20/18	3	document and review pro se filings to determine whether response needed
2/21/18	0.3	edit plaintiff settlement declarations
		continue documenting and reviewing pro se filings to determine whether
2/21/18	2.6	response needed
2/23/18	1.8	draft omnibus response to pro se filings
2/26/18	2.7	draft summary of pro se filings
2/26/18	1	draft omnibus response to pro se filings
3/2/18	0.6	finalize settlement declarations
3/2/18	1.4	prepare for visit to Pack Unit
3/5/18	7	visit plaintiffs at Pack Unit to review settlement and declarations
3/6/18	12	prepare for and visit Marvin Yates at Stiles to review settlement and declaration
3/7/18	1.7	revise omnibus response to pro se filings
3/20/17	2.9	draft omnibus response to pro se filings
4/2/18	0.2	draft letter to plaintiffs re status of notice distribution at Pack Unit
4/15/18	6	draft response to Amir-Sharif motion for sanctions
4/17/18	1.6	search for Amir-Sharif pro se filings in other districts for response to appeal
4/17/18	1.2	edit response to Amir-Sharif motion for sanctions and draft proposed order
		draft declaration regarding service of Doc. 1036 for response to motion for
4/17/18	1.3	sanctions
4/18/18	0.5	finalize and file response to Amir-Sharif motion for sanctions
4/18/18	0.4	draft and edit opt out withdrawal form
		prepare for and visit class members Victor Salinas and John McMillan at Estelle
4/24/18	7	Unit
4/25/18	0.6	review and type notes regarding visit to Estelle Unit
4/27/18	2	draft omnibus response to pro se filings
4/30/17	0.8	revise omnibus response to pro se filings
5/1/18	9	prepare for and visit class members and opt outs at Pack Unit
5/2/18	0.6	revise omnibus response to pro se filings
Total Hours	71.1	
Total Fee	21330	

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Exhibit C

Pack Unit Class Action**Justin Atkinson****(Legal Assistant) - \$150/Hour (March 6 to May 4, 2018)**

Date	Hours	Task
3/13/18	1.5	Read and summarize new inmate correspondence
3/20/18	2	Read and summarize new inmate correspondence
3/23/18	1.5	Read and summarize new inmate correspondence
3/28/18	4	Prepare and review class notice materials
3/28/18	1	Read and summarize new inmate correspondence
3/29/18	4	Prepare and review class notice materials
4/2/18	2	Read and summarize new opt-out correspondence
4/4/18	1	Read and summarize new opt-out correspondence
4/9/18	1.5	Read and summarize new opt-out correspondence
4/11/18	1	Read and summarize new opt-out correspondence
4/17/18	1	Read and summarize new opt-out correspondence
4/18/18	2.5	Read and summarize new opt-out correspondence
4/19/18	0.5	Read and summarize new opt-out correspondence
4/25/18	1.5	Read and summarize new opt-out correspondence
4/27/18	1	Read and summarize new opt-out correspondence
4/30/18	1	Read and summarize new opt-out correspondence
Total Hours	27	
Total Fee	\$4,050.00	

(Legal Assistant - \$150/hour)

Date	Hours	Task
3/23/18	5	Translate Opt Out documents (court-approved notice, confidential letter from counsel) (English to Spanish)
3/23/18	6	Translate Opt Out documents (court-approved notice, confidential letter from counsel) (English to Spanish)
43,187.00	4.00	Prepare class notice materials
43,188.00	2.00	Prepare class notice materials
Total	17	

Total Fee	\$2,550.00
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